REMARKS

Claims 1-9, 11-13 and 15-39 were pending as of the action mailed May 19, 2008.
Reconsideration is respectfully requested in view of the following remarks.

INTERVIEW SUMMARY

The Applicant thanks the Examiner for the opportunity of a telephonic interview on
August 12, 2008. The participants in the interview were Examiner Eunhee Kim and Applicant's
representative Andrew Leung.

Claim 1 was discussed in view of the cited references. No agreement was reached with
respect to the claims.

§ 103 REJECTIONS

Claims 1-9, 11-13, and 15-39 were rejected under 35 U.S.C. § 103 as allegedly
unpatentable over a 2001 archival copy of a page in the official website of D-Cubed, Ltd. (the "D
Cubed reference") in view of a January 2002 manual for the 2D Dimensional Constraint
Manager by D-Cubed, Ltd. (the "2D DCM Manual) and in further view of a 1994 manual for
KeyCad ("KeyCad"). The rejections are respectfully traversed.

Claim 1

Claim 1 recites in part, "receiving an input for a pattern, the pattern comprising a
plurality of features enclosed within a boundary of a CAD geometry piece where a feature
corresponds to a feature of the CAD geometry piece; receiving an indication of modification to
the CAD geometry piece; automatically modifying the CAD geometry piece and its boundary
based at least upon the received indication; and automatically maintaining continuous enclosure
of the pattern within the boundary of the modified CAD geometry piece, including automatically
modifying at least one of the pattern or the plurality of features to be continuously enclosed
within the boundary of the modified CAD geometry piece, based at least upon the modified CAD
geometry piece and the received input."

The Examiner conceded that neither the D-Cubed reference nor the 2D DCM Manual teaches the above recited features, but instead cites KeyCad as allegedly teaches these features. KeyCad discloses a "grouping" feature that can group multiple objects into one grouped object. The grouped objects share the same boundary points.

The Applicant respectfully submits that the grouping feature of KeyCad does not teach the recited feature "receiving an input for a pattern." Merely grouping multiple objects into one grouped object does not make a pattern out of the objects. The grouping feature of KeyCad groups multiple arbitrary objects together for ease of manipulation, but does not turn those arbitrary objects into a pattern. Thus, it cannot be said that KeyCad teaches or suggests "receiving an input for a pattern."

Further, the Applicant respectfully submits that the combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach or suggest "receiving an indication of modification to the CAD geometry piece," even if the grouping feature in KeyCad does teach "receiving an input for a pattern", which Applicant does not concede. First, the cited passages from the D-Cubed reference describes the user specifying a change to the rules (e.g., dimensions, constraints) governing the geometries, which is different from changing the geometry itself. Thus, the D-Cubed reference cannot be said to teach or suggest "receiving an indication of modification to the CAD geometry piece."

The cited portions of the 2D DCM Manual describe a vertical line, a rectangle, and a point. The cited portions describe that when the point is moved away from the line, the rectangle can be resized to maintain particular distances. However, this does not teach or suggest "receiving an indication of modification to [a] CAD geometry piece" because the vertical line, which the Examiner equates with the recited boundary of the CAD geometry piece, was not moved and remains fixed. Even under the Examiner's equivalence of the vertical line as the boundary of a CAD geometry piece, the point cannot be said to be a part of the CAD geometry piece with the vertical line. Thus, the 2D DCM Manual cannot be said to teach or suggest "receiving an indication of modification to the CAD geometry piece."

Finally, even if the grouping feature of KeyCad does teach "receiving an input for a pattern, the pattern comprising a plurality of features enclosed within a boundary of a CAD geometry piece" (which point the Applicant does not concede), the relied upon portions of KeyCad still do not teach or suggest receiving an indication of a modification to the CAD geometry piece. More specifically, the relied upon portions of KeyCad show a user modifying the grouped objects (e.g., moving the grouped objects), not modifying a pattern.

For at least the reasons stated above, the rejection should be withdrawn.

Claims 2-9, 11, 34-35

Claims 2-9, 11, 34-35 depend from claim 1, and are allowable for at least the reasons stated above.

Claim 12

Claim 12 recites an apparatus comprising a storage medium having instructions which, when executed, cause the apparatus to "receive an input corresponding to generation of a pattern in a computer aided design (CAD) geometry piece, the pattern comprising a plurality of features enclosed within a boundary of the CAD geometry piece where a feature corresponds to a feature of the CAD geometry piece; receive an indication of modification to the CAD geometry piece; automatically modify the CAD geometry piece and its boundary based at least upon the received indication; and automatically maintain continuous enclosure of the pattern within the boundary of the modified CAD geometry piece, including instructions, which when executed, cause the apparatus to automatically modify at least one of the pattern or the plurality of features to be continuously enclosed within the boundary of the modified CAD geometry piece, based at least upon the modified CAD geometry piece and the received input." As descried above with respect to claim 1, the combination of combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach or suggest these features. Thus, the rejection should be withdrawn.

Claims 13, 15-22, 36-37

Claims 13, 15-22, 36-37 depend from claim 12, and are allowable for at least the reasons stated above.

Claim 23

Claim 23 recites an article of manufacture having instructions which, when executed, cause a machine to "receive an input for a pattern, the pattern comprising a plurality of features enclosed within a boundary of a CAD geometry piece where a feature corresponds to a feature of the CAD geometry piece; receive an indication of modification to the CAD geometry piece; automatically modify the CAD geometry piece and its boundary based at least upon the received indication; and automatically maintain continuous enclosure of the pattern within the boundary of the modified CAD geometry piece, including instructions, which when executed, cause the machine to automatically modify at least one of the pattern or the plurality of features to be continuously enclosed within the boundary of the modified CAD geometry piece, based at least upon the modified CAD geometry piece and the received input." As descried above with respect to claim 1, the combination of combination of the D-Cubed reference, the 2D DCM Manual, and KeyCad does not teach or suggest these features. Thus, the rejection should be withdrawn.

Claims 24-33, 38-39

Claims 24-33, 38-39 depend from claim 23, and are allowable for at least the reasons stated above.

CONCLUSION

For at least the foregoing reasons, the applicant submits that the pending claims are in condition for allowance.

By responding in the foregoing remarks only to particular positions taken by the examiner, the applicant does not acquiesce with other positions that have not been explicitly addressed. In addition, the applicant's selecting some particular arguments for the patentability of a claim should not be understood as implying that no other reasons for the patentability of that

claim exist. Finally, the applicant's decision to amend or cancel any claim should not be understood as implying that the applicant agrees with any positions taken by the examiner with respect to that claim or other claims.

The one (1) month extension of time fee in the amount of $120 is being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply any other credits or charges to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 10 September 2008

Andrew H. Leung
Reg. No. 55,374

Customer No. 26181
Fish & Richardson P.C.
Telephone: (650) 839-5070
Facsimile: (877) 769-7945

50497549.doc